Final
Record of Decision
For
No Action
For Soil at
Six (6) Sites: PRL B-004, SA 064, SA 039, SA 050, PRL 035, and SA 017

Former McClellan AFB, CA

16 January 2003

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Appendixes

Attachments

Acronyms/Abbreviations

AFB	Air Force Base
AFRPA	Air Force Real Property Agency
ATSDR	Agency for Toxic Substances and Disease Registry
BCT	BRAC Cleanup Team
bgs	below ground surface
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CRP	Community Relations Plan
CS	Confirmed Site
DHS	Department of Health Services
DTSC	Department of Toxic Substances Control
EAU	Environmental Action Update
EE/CA	Engineering Evaluation/Cost Analysis
ECO	ecological
EPA	Environmental Protection Agency
ESF	Environmental Summary Folders
FOSET	Finding of Suitability for Early Transfer
GW	groundwater
GWOU	groundwater operable unit
GWTP	Groundwater Treatment Plant
IAG	Interagency Agreement
IR	Information Repository
IROD	Interim Record of Decision
IRP	Installation Restoration Program
LRA	Local Redevelopment Authority
msl	mean sea level
NCP	National (Oil and Hazardous Substances Pollution) Contingency Plan
NPL	National Priority List

Acronyms/Abbreviations (continued)

O&M	Operations and Maintenance
OPS	operating property and successfully
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PCB	polychlorinated biphenyl
PP	Proposed Plan
PRL	Potential Release Location
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RD/RA	Remedial Design/Remedial Action
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SA	Study Area
SARA	Superfund Amendments and Reauthorization Act
SVE	Soil Vapor Extraction
TBD	to be determined
TCRA	Time Critical Response Action
TPH	total petroleum hydrocarbons
USFWS	US Fish and Wildlife Service
UST	Underground Storage Tank
VOC	volatile organic compound

DECLARATION

SITE NAME AND LOCATION

McClellan Air Force Base (Closed 13 July 2001)
Sacramento County, California (See Location Map, Appendix 1)

Soil at Six (6) Sites: PRL B-004, SA 064, SA 039,
SA 050, PRL 035, and SA 017

National Superfund Database Identification Number: 0902759
Environmental Protection Agency (EPA) Identification Number: CA4570024337

STATEMENT OF BASIS AND PURPOSE

McClellan Air Force Base (AFB) consists of 2856 acres. This acreage has been subdivided into ten (10) Operable Units in which 302 contaminated sites have been investigated. Investigative work has also been accomplished for groundwater contamination under the Groundwater Operable Unit. See Appendix 2 for Operable Unit map.

The Base has been divided into separate land parcels for property transfer and Cleanup Decisions. See **Section 4, Scope and Role of Operable Unit or Response Action,** for Land Parcel Transfer table and Cleanup Decision Map. Information from the several Operable Unit documents supports the Cleanup Decision documents.

This No Action Decision addresses six (6) individual sites located throughout the base. See map at **Section 5, Summary of Site Characteristics, Page 5-1**. This Record of Decision does not address possible groundwater or sewer line contamination at the six sites. These two items will be addressed under subsequent Records of Decision. The remedies for the remaining 296 sites will be addressed in subsequent Land Parcel Transfer or Groundwater Cleanup Records of Decision.

The six sites addressed in this Record of Decision have been characterized as not requiring any soil remediation - No Action. After review of all investigative information, it was found that these six sites were either not in existence or there was no contamination at the site.

This decision document presents the Air Force Real Property Agency (AFRPA) decision for the listed sites located at the former McClellan Air Force Base, in Sacramento California, which was chosen in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by Superfund Amendments and Reauthorization Act (SARA), and, to the extent practicable, the National (Oil and Hazardous Substances Pollution) Contingency Plan (NCP). The decision is based on the Administrative Record file for these sites.

The State of California concurs with the AFRPA decisions regarding the six sites.

ASSESSMENT OF THE SITE

The no action decision for soil contamination only addresses these six sites. This Record of Decision does not address possible groundwater or sewer line contamination at the six sites. These two topics will be addressed in a separate ROD or RODs. If applicable, groundwater and sewer line restrictions (i.e., institutional controls) will be implemented to prevent exposure to contaminated groundwater and prevent interference with the groundwater and sewer line remedial action. The Air Force, as lead agency, has determined that no action is necessary for soil to protect public health, welfare, or the environment.

DESCRIPTION OF THE AFRPA DECISION (SELECTED REMEDY)

The Air Force, as lead agency, has determined that no CERCLA action is necessary for soil at the six sites. This decision was made after reviewing all investigative information. It was found that these six sites were either not in existence or there was no contamination at the site. This Record of Decision does not address possible groundwater or sewer line contamination at the six sites. These two topics will be addressed under subsequent Record of Decisions. The remedies for the remaining 296 sites at the former McClellan AFB will be addressed in subsequent Land Parcel Transfer or Groundwater Cleanup Record of Decisions.

STATUTORY DETERMINATIONS

No CERCLA 121 statutory determinations are necessary since there is no risk and there is no remedial action being selected. The Air Force, as lead agency, has determined that no soil remedial action is necessary at these six sites to ensure protection of human health and the environment.

RECORD OF DECISION DATA CERTIFICATION CHECKLIST

This section is not necessary since no remedy is being selected. The Air Force, as lead agency, has determined that no soil remedial action is necessary at these six sites to ensure protection of human health and the environment.

AUTHORIZING SIGNATURES:

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Section 1
SITE NAME, LOCATION, AND DESCRIPTION

1.1 SITE NAME

There are six (6) sites addressed in this decision document located at the former McClellan Air Force Base, Sacramento County, California

-
- PRL B-004
- SA 064
- SA 039
- SA 050
- PRL 035
- SA 017

National Superfund Database Identification Number: 0902759
EPA Identification Number: CA4570024337

1.2 SITE LOCATION

McClellan AFB is located 7 miles northeast of downtown Sacramento, California. The installation currently comprises 2,856 acres bounded by the city of Sacramento on the west and southwest, the city of Antelope on the north, the unincorporated area of Rio Linda on the northwest, and the city of North Highlands on the east (see Appendix 1). Past Air Force land use on base was a combination of open grassland, industrial (miscellaneous aircraft operations/maintenance), light industrial (warehouses, laboratories, miscellaneous support services), aircraft runways (and taxiways, ramps, mats, aprons, etc.), office buildings, and residential uses. Most of the industrial facilities are in the southeastern portion of the base. The southwestern portion was both industrial and storage areas; the far western part has vernal pools and wetlands areas. Between these wetlands and the engine test cells along the taxiways is an open area that was used as disposal pits. The northeast portion had several aircraft washracks and parking areas.

1.3 LEAD AND SUPPORT AGENCIES

Lead Agency: U.S. Air Force

Support Agencies: U.S. Environmental Protection Agency Region IX
California Department of Toxic Substances Control
California Regional Water Quality Control Board, Region 5

Source of Cleanup Monies: U.S. Congress - Department of Defense Budget

1.4 BASE CLOSURE DECISION

In June 1995, the Congressional Base Realignment and Closure (BRAC) committee recommended the closure of McClellan Air Force Base (AFB). The committee's recommendation became effective on 28 September 1995. BRAC 1995 legislation required that the installation be closed as an active military facility no later than 13 July 2001.

1.5 SITE DESCRIPTION

McClellan AFB was an active industrial facility almost since its dedication in 1936, when it was called the Sacramento Air Depot. The base originally covered an area of approximately 1,130 acres. Operations changed over time from maintenance of bombers during World War II and the Korean War to maintenance of jet aircraft in the 1960s, and at time of closure in 2001 to include the maintenance and repair of communications equipment and electronics. In fulfilling its mission to defend the United States through aircraft operations and maintenance, McClellan AFB engaged in a wide variety of operations involving the use, storage, and disposal of hazardous materials. These materials include industrial solvents, caustic cleaners, electroplating chemicals, heavy metals, polychlorinated biphenyls (PCBs), low-level radioactive wastes, and a variety of fuel oils and lubricants. Over the lifetime of McClellan, industrial activities involving hazardous materials moved to different on-base locations. Consequently, facilities where hazardous materials were once used or disposed may no longer exist or new activities may be conducted at the location. Some of the buildings at McClellan AFB that were constructed in the 1930s and 1940s still remain. Of these buildings, 51 comprise the historical district on the east side of the base. These buildings include the Base Headquarters and a residential area. One hundred more buildings will become eligible for historic designation within the next 10 years.

Surface features at McClellan AFB include open grassland, creeks and drainages, and vernal pools, as well as industrial, residential, and runway areas. The land surface is a relatively flat plain that slopes gently to the west. Surface elevations range from about 75 feet above mean sea level (msl) on the eastern side of the base to about 50 feet msl on the western side. Two creeks receive most of the surface water runoff at McClellan AFB: Magpie Creek in the southern portion of the base and Don Julio Creek in the north-central portion. Secondary drainages include Rio Linda Creek in the northern portion of the base and Second Creek (which is channelized on base) traversing the central portion. The McClellan AFB stormwater drainage system directs stormwater runoff to these creeks and to Arcade Creek south of the base. These creeks also carry urban runoff from sources upstream of McClellan AFB. Figure 1-4 in Appendix 3 presents a conceptualized view of the regional geology. The deposited materials in the Great Valley are shown in a cross section between the Sierra Nevada and Coast Ranges. Surface soils at McClellan AFB are variable, but generally are sediments that have formed from stream erosion of predominantly granite rocks in the Sierra Nevada. A hardpan layer, approximately 2 to 4 inches thick, has developed over large areas of the base at depths ranging from 3 to 10 feet below ground surface (bgs) and slows, but does not halt, infiltration of water. As a result, contamination occurring on the surface can migrate deeper and potentially to groundwater (Radian International, 1999).

Appendix 4 presents a conceptualized view of the geology beneath McClellan AFB. The vadose and shallow groundwater zones under McClellan AFB consist of alluvial and fluvial deposits that originated in the Sierra Nevada and were deposited during the last 5 million years. The vadose zone is the unsaturated soils between the ground surface and the water table. There are approximately 100 feet of vadose zone and 1,000 feet of saturated (groundwater) zone beneath McClellan AFB. Soil in the vadose zone is composed of interbedded layers of sands, silts, and clays. Clays and hardpan layers slow, but do not halt, infiltration of liquids (Radian International, 1999).

Groundwater is encountered at about 100 feet bgs, and flows generally south-southwest. However, the water table was at one time much higher; water levels have declined continuously for about 50 years because of overdrafting by irrigation, supply, and extraction wells. In areas of groundwater contamination, changes in flow direction and the declining water table have produced a contaminant "smear zone." As groundwater levels declined, some of the groundwater contaminants remained in the newly exposed portion of the vadose zone. These contaminants have remained as gases in soil pore spaces or as liquid films. Smear zones are generally encountered at 50 to 100 feet bgs beneath McClellan AFB (Radian International, 1999). The groundwater beneath McClellan AFB behaves as one hydrogeologic unit. That is, only one interconnected aquifer, or water-bearing zone, is present. For remedial investigation purposes, the groundwater zone under McClellan AFB has been subdivided into Monitoring Zones A, B, C, D, and E (see Figure in Appendix 5). These zones vary in thickness from east to west, reflecting different depositional environments with stream flows across the base from east to west or northeast to southwest. Although the zones are connected, water within each zone moves more readily horizontally than it moves vertically between zones. By measuring changes in groundwater flow and contaminant migration within each zone, scientists are better able to monitor and remediate the groundwater contamination beneath McClellan AFB (Radian International, 1999).

Natural resources at McClellan AFB comprise both natural (undeveloped) and developed areas that are inhabited by local plants and wildlife. Natural habitats include open grassland areas with ephemeral wetlands (vernal pools) on the western side of the base and at the Davis Site, as well as riparian areas along creeks in the western portion of the base and Camp Kohler. Developed habitats include the Beaver Pond area, built for flood retention, and the oxidation aeration ponds next to Patrol Road, all on the western side of the base. Wildlife species observed in these areas include several species of raptors and other birds, small mammals, reptiles, and various insect species. Burrowing owls are known to build nests in creek outfalls and along creek channels in several locations on the east side of the base. Particularly sensitive plants and wildlife, including species listed as threatened or endangered, inhabit the following areas of base property:

- Riparian areas along Don Julio Creek and Magpie Creek;
- Vernal pools and adjacent grasslands near Don Julio Creek; and
- Vernal pools and adjacent grasslands at the Davis Site.

The local plants and wildlife that inhabit McClellan AFB are considered ecological receptors of contamination identified at base property. The term "receptors" refers to humans or wildlife species that are or have the potential to be exposed to contaminants. Potential impacts to ecological receptors are anticipated for portions of Magpie Creek

from contaminated sediments and from contaminated tailing piles that have been deposited along the banks of Magpie Creek. The Air Force is considering a request by the U.S. Environmental Protection Agency to perform a removal action for the contaminated tailing piles due to estimated unacceptable risks to ecological receptors. Remedial action is also anticipated for contaminated sediments in portions of Magpie Creek due to elevated concentrations of contaminants of concern.

Section 2
SITE HISTORY AND ENFORCEMENT ACTIVITIES

Environmental contamination at McClellan Air Force Base has resulted from disposal of hazardous chemicals into disposal pits, sumps near industrial operations, leaks near industrial waste lines, surface spills, disposal pits (some containing low level radiological contamination), and underground storage tanks (USTs). Contamination was first discovered in McClellan AFB groundwater wells in 1979. This discovery led to further groundwater sampling and identification of a large groundwater contamination problem attributable to operations at McClellan AFB. The discovery of contaminants at McClellan AFB and other bases, and the passage of CERCLA in 1980, led to the formation of the Air Force Installation Restoration Program (IRP) in 1981. In 1988, the entire McClellan AFB was included on the National Priority List (NPL) due the large groundwater contamination plumes. There are hundreds of acres of contaminated soil in the vadose zone, and many large groundwater plumes consisting primarily of trichloroethene contaminated groundwater; however, numerous other contaminates are present.

Restoration work at McClellan AFB is conducted under an Interagency Agreement (IAG) signed by the Air Force, U.S. EPA Region IX, and the Department of Health Services (DHS) (IAG, 1990). The IAG was signed in 1989 and implemented in 1990. In a subsequent reorganization by the state, the duties, responsibilities, and authorities of DHS were transferred to the California Department of Toxic Substances Control (DTSC) of the California EPA. The IAG is a contract between the Air Force and regulatory agencies. The general purposes of the IAG are to:

- Ensure that the environmental impacts associated with past and present activities at McClellan AFB are thoroughly investigated and appropriate remedial action as necessary to protect the public health, welfare, and the environment;
- Establish a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions at McClellan AFB in accordance with applicable federal and state environmental regulations; and
- Facilitate cooperation, exchange of information, and participation of IAG parties in each action.

Under the IAG, all parties agree to deadlines for CERCLA documents including Remedial Investigation/Feasibility Study (RI/FS), Proposed Plan (PP), ROD, and Remedial Design (RD) Work Plan documents. Schedules for remedial design/remedial action (RD/RA) and operations and maintenance (O&M) that are proposed in the Draft RD Work Plan, Draft RA Work Plan, and Draft O&M Plan become final agreements under the IAG once a Final Plan is approved by all IAG parties. For the McClellan AFB IAG schedule, the above post-ROD plans will act to clarify the legally enforceable AFRPA decision and its implementation, including a schedule.

McClellan AFB has 302 "sites," i.e., 302 areas that are tracked for contamination and cleanup under the jurisdiction of the Air Force. The term "site" generally means an area where contaminants have been released to the environment; however, there are instances where a site could not be found.

When the IAG for McClellan AFB was signed, the base was divided into eight geographic areas, called Operable Units (OUs) A, B, C, D, E, F, G, and H. Each of these eight OUs included the surface soil, subsurface, and groundwater within the OU boundary. Originally, the OUs encompassed smaller "core" areas including the subdivisions of OU A (A1, A2, and A3), OU B (B1 and B2), and OU C (C1 and C2). The OU subdivisions were eliminated; however, two OU subdivisions, B1 and C1, were created to focus on specific contamination problems in a limited area. There are now 10 designated OUs at McClellan AFB: A, B, B1, C, C1, D, E, F, G, and H. An eleventh OU, the groundwater (GW) OU was established in 1993. The GW OU addresses groundwater contamination beneath on- and off-base properties. It was designated to combine the groundwater investigation and remediation efforts for all basewide OUs and for the off-base sites. As additional groundwater data were collected, the Air Force realized that existing contaminated groundwater plumes had migrated beyond geographic OU boundaries. In some cases, the contaminant plumes had commingled with plumes from other OUs and off the installation. By combining all groundwater contamination into one OU, groundwater strategies and actions could be applied across the entire groundwater medium, regardless of geographic boundaries. The other OUs focus on surface and vadose zone contamination and potential source areas.

- McClellan has two Interim Record of Decisions (IROD):
    - OU B1 IROD in 1993, which required a cap to be installed at a PCB site.
    - Groundwater Operable Unit (GWOU) IROD in 1995, which established groundwater containment requirements.

McClellan completed a five (5) year review in 1999. The actions taken to date by the Air Force were found to be protective. It was also found that much more restoration work was needed in order to finish the cleanup work**.** The next five-year review is scheduled to be finalized by 2004.

Numerous Interim Actions have been completed since 1979. These actions include numerous Soil Vapor Extraction (SVE) Systems installed under a Presumptive Remedy; Site Excavations (dig and haul); OU B1 & OU D caps; Extensive Groundwater Pump and Treat Containment System; Dual Phase Extraction Systems; and Soil Treatment facilities.

Under the groundwater IROD, AFRPA is operating a groundwater extraction and treatment system to contain the groundwater contamination and protect human health and the environment. This system of wells currently treats approximately 1.8 million gallons of groundwater per day, removing the contaminant mass as already described. VOCs are removed from the vadose zone by the installation and operation of Soil Vapor Extraction (SVE) systems. These SVE systems reduce the time and cost of groundwater cleanup by preventing the further downward migration of VOCs to the groundwater. The total VOCs removed and destroyed by the groundwater and SVE treatment systems exceeds 1,000,000 pounds; 95% comes from the SVE systems.

All of the VOC sites have completed the remedial investigation/feasibility study (RI/FS) process for evaluating impacts to groundwater. RI work is still underway to determine whether there is a potential VOC health impact on indoor air. A shallow soil gas investigation has been initiated, and fieldwork is planned to begin in fall 2002. McClellan AFB issued a PP for its VOC ROD in March 2000. The State of California disputed the Air Force's PP, particularly in regard to "how clean is clean" for VOCs in groundwater. The AFRPA, the EPA, and the State have reached agreement to resolve the dispute and

work on the Basewide VOC ROD will continue once the shallow soil gas indoor air risk issue is settled. Meanwhile, design of the Phase 3 interim remedial actions has been initiated with preparation of the Phase 3 interim work plan. Fieldwork to install additional extraction systems will begin upon completion of the work plan and design documents. Currently, 62 additional extraction wells are planned. The final VOC ROD is expected to be completed in 2004/05; the extraction systems are expected to be operational by the end of 2005.

The groundwater extracted to contain the VOC contamination is treated at the groundwater treatment plant (GWTP) and discharged to Magpie Creek or the sanitary sewer system. The monitoring required for the treated groundwater discharge has indicated the presence of hexavalent chromium at concentrations that have frequently exceeded the National Pollutant Discharge Elimination System (NPDES) discharge limits included in the GWTP Operations and Maintenance Manual (URSG Laidlaw, 1999) in the past year. To meet the discharge limits, some extraction wells have been taken off-line, and the reduced extraction rates have resulted in loss of capture of VOC-contaminated groundwater at some locations. A Time Critical Removal Action (TCRA) has been initiated to address the problem of capture, to be prepared to accommodate the planned increase in extraction volumes as the Phase 3 wells are installed, and to decrease the threat to the environment and public welfare. The action to be completed under the TCRA will be the installation of a treatment system to reduce the hexavalent chromium concentrations to acceptable levels. An action memorandum (AFBCA, 2002a) was completed in July 2002 documenting the actions that will be taken. In addition to installing a treatment system at the GWTP, monitoring and extraction wells basewide are being sampled for hexavalent chromium and metals to evaluate the presence and range of concentrations in groundwater. A background study is also planned to evaluate if concentrations of hexavalent chromium are naturally occurring. The sample results from both of these efforts will be evaluated to determine the possible sources of both potentially naturally occurring and introduced contamination.

Non-VOC sites vary in degree and type of contamination (metals, PCBs, polynuclear aromatic hydrocarbons [PAHs], and radionuclides), health risks posed by the contamination, and complexity. The ROD and cleanup schedules have, in the past, been developed to take advantage of the expected development and application of remediation technologies at the less contaminated and complex sites before addressing the more complex and highly contaminated landfill and disposal sites.

The discovery of a small quantity of plutonium that was buried in a disposal site (CS 10) on base has caused AFBCA to re-evaluate all radiological RI work to date. The presence of plutonium was unexpected; a classified tenant at McClellan AFB probably disposed of the plutonium. AFRPA has revised its basewide radiological conceptual model (CM) and begun extensive preliminary assessment/site investigation (PA/SI) work that will lead to further RI work. Additional PA/SI or RI radiological work is occurring along the airfield where aircraft washing was done, within the sewer collection system, and within specified buildings. CS 10, the site where the plutonium was found, is being cleaned up under a TCRA.

AFRPA updated the McClellan Creek Storm Water Conceptual Model in 2002 and also the Base wetlands delineation in 2001. The U.S. Army Corps of Engineers has certified the updated delineation. The vernal pools on McClellan AFB are habitat, or potential habitat, for the vernal pool fairy shrimp, a federally listed threatened species. In addition, riparian and in-stream habitats associated with Magpie, Don Julio, and Robla Creeks

provide potential habitat for the giant garter snake and, where elderberry shrubs are present, for the valley elderberry longhorn beetle; both are federally listed as threatened

AFRPA is currently managing approximately 500 acres on McClellan as natural areas. In 1997, sensitive habitat (wetlands and elderberry shrubs) along Magpie and Don Julio Creeks was damaged as a result of creek-dredging efforts. A Section 7 consultation with the USFWS was required to address impacts to federally listed species, and off-site mitigation credits were purchased to mitigate for the habitat damage. An Ecological Risk Assessment prepared for the Creeks area identified sufficient ecological risk to warrant a cleanup action. Options for cleanup of the Creeks area will be evaluated through the CERCLA process and documented in the Ecological Sites FS and ROD.

A Biological Opinion regarding mowing grassy areas within the airfield was completed in August 2002. The Opinion allows mowing to promote aircraft safety and specifies conservation measures that must be implemented to protect wildlife and habitat in the area.

The Agency for Toxic Substances and Disease Registry (ATSDR) began a Public Health Assessment at McClellan AFB in 1989. In the 22 March 1994, Final Report, ATSDR listed 12 conclusions. The main conclusion was that McClellan AFB is a public health hazard because of past exposure of people on- and off-base to environmental contamination. The report listed recommendations that led to a Public Health Action Plan containing 18 action items, which have either been implemented or completed. ATSDR began a cross-sectional health study at McClellan AFB in 1994, as recommended in the Public Health Assessment, to address the health concerns of local residents resulting from the potential exposures to the contaminants emanating from the base. In its January 1996 Final Report, ATSDR listed seven conclusions, the main ones stating that target area participants experience self-reported illnesses such as ulcers, stomach diseases, liver problems, and kidney problems. However, due to recent medical discoveries that some ulcers are caused by bacterial infections, ATSDR contacted the target area participants with these problems in the summer of 1998 to notify them of this new information. The participants and their physicians were informed of what testing can be performed to determine if they have a bacterial infection and what antibiotics could cure the ulcers. Target area participants were also retested for early kidney disease. These efforts on the part of the ATSDR to follow-up on target area participants were not a result of the discovery of new problems surrounding the contamination at McClellan AFB, but rather to provide the individuals with up-to-date medical information in relation to their specific illnesses. From 1995-1997, ATSDR implemented an environmental health education effort for local military and civilian health care providers to assist the community in assessing possible adverse health outcomes associated with exposure to hazardous substances as recommended in the Public Health Assessment. This effort was a partnership between ATSDR, Kaiser Permanente, and McClellan AFB personnel. The ATSDR continues to maintain a relationship with Kaiser Permanente to further environmental health education. The ATSDR will be contacted by the Air Force to implement other public health actions as needed for the community surrounding McClellan AFB.

During modifications and performance optimization of the Groundwater Treatment Plant (GWTP) in September 1996, the GWTP discharge to Magpie Creek exceeded the surface water discharge requirements for volatile organic compounds (VOCs). It was estimated that approximately 2 million gallons of effluent was discharged to Magpie Creek from

3 September through 5 September 1996. This discharge resulted in EPA Region IX issuing a $15,000 stipulated penalty to the Air Force. The exceedance of effluent requirements established for the GWTP was attributed to three findings: 1) the carbon trains were not placed in series; therefore, the breakthrough that occurred for one carbon vessel was not treated by the subsequent carbon vessel; 2) sampling of effluent at specified locations did not occur as required; and 3) the carbon vessels were near saturation, which allowed breakthrough to occur sooner than expected. In response to the exceedance, corrective actions were implemented to address the deficiencies: 1) the existing carbon was replaced with new carbon; 2) the carbon vessels were arranged in series and in the event of a breakthrough of the operating carbon trains, the off-line train is placed into service; and 3) a new sampling strategy was implemented for the new carbon train configuration and an internal "checklist" was developed by McClellan AFB to ensure sampling is performed correctly.

Section 3
COMMUNITY PARTICIPATION

Community involvement in McClellan AFB's investigation and remediation program has been continuous since the initial discovery of groundwater contamination in 1979. Involvement has taken many forms, including task forces, a technical review committee, public meetings, open houses, and community interviews. Community participation in the IRP that was initiated by the Air Force to address the contamination discovered at the base has been part of the process since 1983. An IRP task force was formed and provided input to the process from 1983 to1990. At that time, the Technical Review Committee was formed to continue public participation in the IRP. In late 1994, the initial Restoration Advisory Board (RAB) was formed. In late 2000 the RAB was reconstituted. The first full functioning meeting of the reconstituted RAB convened in January 2001. The current RAB consists of members representing diverse areas of the community, regulatory agencies, and Air Force. The meetings are facilitated and there are no co-chairs.

The Community Relations Plan (CRP) outlines the community relation's activities that McClellan AFB will undertake to maintain and foster two-way communication with the community. The CRP was first approved in 1985 and has been revised in 1988, 1991, 1992, 1993, 1996, 1998, and is currently being updated. Updates include community interviews. These are used to gauge the concerns, opinions, and interests of a cross section of the community. Community interviews were conducted in 1985, 1987, 1990, 1992, 1995, 1998, and 2002 and incorporated into the CRP. Community relation activities include the following:

- Public meetings. Public meetings have been held since 1984, including the quarterly RAB meetings.
- Public comment periods allow the public to express their ideas, comments, and concerns about proposed actions.
- Press releases. Issued when a restoration activity is considered newsworthy.
- The Environmental Action Update (EAU) is the quarterly environmental newsletter. The newsletter is one of the ways McClellan AFB notifies the public about the progress of the IRP.
- Fact sheets. The fact sheets allow longer articles to be published than in the EAU.
- Mailing list. The Environmental Action Update and fact sheets are mailed to all members of the McClellan AFB mailing list, which currently totals more than 2,500 names. The mailing list is continually updated. This is the list that is used for Proposed Plan distribution for comment.
- Information Repository (IR). The IR is located at McClellan AFB, building 10. Hard copies of documents are available at McClellan AFB, and electronic copies have been placed on the McClellan AFRPA World Wide Web homepage for anyone to read and download. The address is http://www.afrpa.hq.af.mil/mcclellanem

Section 4
SCOPE AND ROLE OF OPERABLE UNIT OR RESPONSE ACTION

The BRAC Cleanup Team (BCT) has developed the ROD schedule outlined in the following table and map, which will address the OUs, A through H, and the GWOU investigative findings.

BCT Record of Decision (ROD) Schedule

#	Name	Current ROD Schedule	Description	# of Sites *(302)*	Remedy Acceptance	Acreage	Deed
1	Basewide VOC (Groundwater) ROD	Jul 04 ***Jun 05***	Establishes VOC base-wide soil & groundwater rqmts	Total - 170 (Also counted in RODs 2-7)	Projected 06-OPS **10-OPS**	1272 (Included in RODs 2-7)	Allows RODs 2-7 to Deed W/O FOSET
2	LRA Initial Parcel ROD	May 03 **Sep 03**	"Simple" sites, significant reuse	Total – 80 ***84***	05 - Response Complete (RC)	662 **642**	03 ***With SOIL FOSET***
3	Small Volume Sites ROD	Jul 04 **Jul 05**	Sites with volumes that do not effect Strategic ROD	Total – 104 ***109***	04 to 05 - RC **06 to 07 - RC**	1411 **1390**	06 - 07 **07 - 08**
4	CS 010/ PRL 032 ROD	Aug 04 **Feb 05**	NFA ROD for completed Time Critical Removal	Total - 2	04 - RC	2	08 - 16 **10 - 16**
5	Strategic Sites ROD	Aug 05 **May 07**	Sets final cleanup strategy for worst sites (e.g. landfills & large sites)	Total – 65 ***92***	07 to 15 - RC **09 to 15 - RC**	436 **489**	08 - 16 **10 - 16**
6	Bldg 252 ROD	Apr 06 **Apr 07**	Complex rad site. Mixed waste & past actions	Total - 1	07 - RC **09 - RC**	1	08 **10**
7	ECO Sites ROD	Aug 06 **May 08**	Ecological Cleanup requirements for impacted ECO Areas	Total - 8	08 - RC **10 - RC**	344 **349**	09 **11**
8	No Further Action ROD	Nov 02 **Apr 03**	Closes out Sites that were found to be Insignificant	Total – 58 ***6***	N/A	61 **6** (Included in RODs 2-7)	TBD

Paul Brunner/rodsall_rev6 (11/01/02)

Bold Are Changes To Baseline.
Bold, Italics, and Underlined are New Changes to Baseline (October 3, 2002)
Baseline Date: 12/20/01

McClellan AFB RODs

ROD Number and Name	Acreage Impact	Baseline Deed Date (yr)	Current Deed Date (yr)
#1 VOC (Groundwater) ROD	1272*	N/A**	N/A**
#2 LRA Initial Parcel ROD	*642*	03***	03***
#3 Air Force Small Volume Sites ROD	*1390*	06/07	*07/08*
#4 Confirmed Site 10/PRL 032 ROD	2	08-16	*10-16*
#5 Strategic Sites ROD	*472*	08-16	*10-16*
#6 Bldg 252 ROD	1	08	*10*
#7 Ecological Sites ROD	349	09	*11*
#8 No Further Action ROD	23*	TBD	TBD

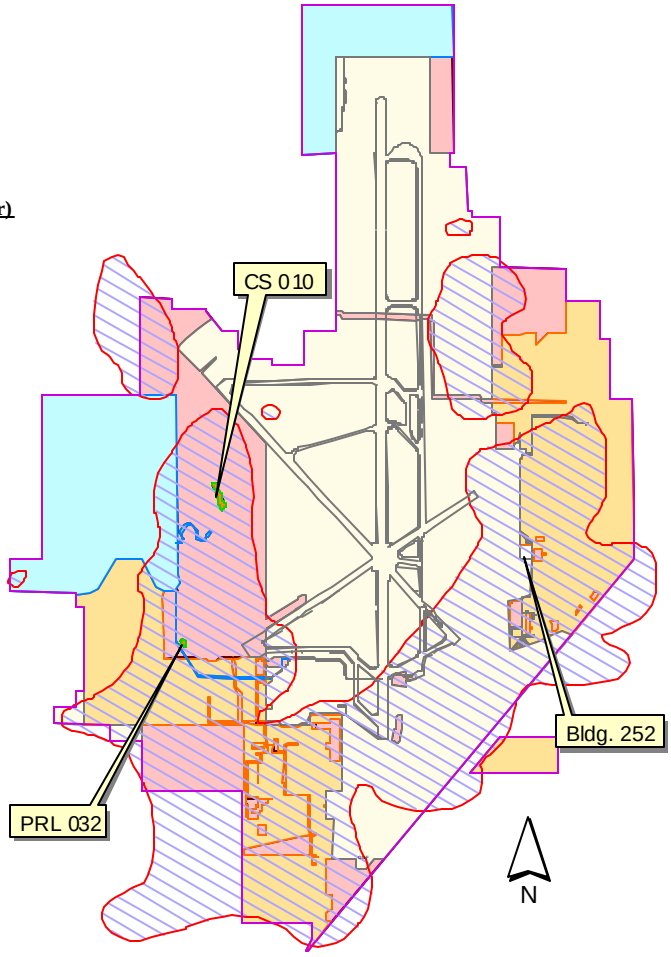
N/A Final Sites ROD Summary

* Included in RODs 2-7 Acreages

** Property impacted by GW ROD will require two RODs to deed - GW ROD & applicable surface soil ROD; unless a FOSET is done

*** With FOSET

Baseline Date: 12/20/01



PaulBrunner\mcafbrods .apr (05/16/02) Baseline Date: 12/20/01

Section 5
SUMMARY OF SITE CHARACTERISTICS

The big picture of McClellan is presented in the Site Description narrative at 1.5. The description and location of the six No Action Sites is provided below. The records for each of these sites is on file at the Administrative Record located at McClellan, building 10 (AFRPA building).

SITE 1: PRL B-004 - (OU A)

This site was reported as being sludge-drying beds northeast of Building 346. However, a review of historical aerial photographs from 1928 showed the area as undeveloped land. Also, in photographs from 1940, part of the Sanitary Waste Treatment Plant had been built, including Buildings 326 and 346, but the surface of the site was exposed soil and there was no indication of sludge drying beds. No significant changes to the location are visible in photographs from the years 1949 through 1988. No action is recommended because no evidence was found that supported the report of sludge drying beds northeast of Building 346. Sludge drying beds were located northeast of Potential Release Location (PRL) B-004, north of Building 326, and designated as Confirmed Site (CS) 40. Confirmed Site 40 is not part of this proposed plan. The rationale for categorizing this site as no action is provided in: Remedial Investigation/Feasibility Study decision Paper, 1991; 1992 Operable Unit A No Further Action Decision Paper located in Appendix J of the 1997 General Framework document.

SITE 2: SA 064 - (OU A)

This site consists of a cafeteria in the western half of Building 353 and the Microfiche Service Center in the eastern half of the building. The majority of the building is surrounded by concrete and asphalt. The service center conducted microfilm developing. This parcel was identified as an Installation Restoration Program site because acids, bases and metals were handled at the site. Handling, storing and disposing of materials complied with governing regulations (Resource Conservation and Recovery Act (RCRA) and the Federal Occupational Safety and Health Administration (OSHA) Hazardous Material Standard, 29 Code of Federal Regulations (CFR)); therefore, collecting soil samples was not necessary. No releases or remedial actions have been reported. No action is recommended because no contamination as a source was found to exist. The rationale for categorizing this site as no action is provided in: No Further Investigation Consensus Statement Attachment 4, 1996; Operable Unit A Preliminary Assessment Summary Report, 1991; Operable Unit A, Part 2A Site Characterization Summary/Field Sampling Plan, 1995; and Operable Unit A, Part 2A Remedial Investigation Characterization Summary, 2001.

SITE 3: SA 039 - (OU A)

This site is a reported motor oil spill near Building 29. The spill occurred prior to construction of Building 29. The area was a parking lot when the spill occurred. The contaminated soil at the site was removed and the area was filled with clean soil in 1986. Building 29 was also constructed in 1986. The site is currently covered with pavement and the foundation of Building 29. During the investigation, soil and soil gas samples were collected. Soil samples were analyzed for total petroleum hydrocarbon (TPH) extractable compounds; however, none were detected. Volatile organic compounds were detected in soil gas samples from one boring drilled at this site; however, the soil gas profiles from this boring suggests contamination is from contaminated groundwater and not from a source at this site. No action is recommended as results showed no contamination at levels that require further action. The rationale for categorizing this site as no action is provided in: No Further Investigation Consensus Statement, 1996; Operable Unit A Interim Basewide Remedial Investigation Part 2A-Site Characterization Summary/Field Sampling Plan, 2001; Group 4; and Operable Unit A Site Characterization Summary/Field Sampling Plan, 1995.

SITE 4: SA 050 - (OU A)

This site is Building 263, which is subdivided into five bays (B through F). Bay B was used for record storage and Bays C through F were administrative offices. Hazardous materials were not used or stored in Bays C through F. Bay B also housed computer equipment, and may have housed electrical equipment containing traces of PCBs (polychlorinated biphenyls). Further research during site surveys determined that the likelihood of soil contamination is minimal because, if PCBs were present in computer power supplies, they were only used in small quantities in sealed instruments. Handling, processing or storing of PCBs outside the power supplies did not occur. Also, the building has a concrete floor with no visible cracks and no floor drains, minimizing potential migration to soil. Therefore no soil samples were collected at the site either around or under the building. No action is recommended as no evidence of contamination was found. The rationale for categorizing this site as no action is provided in: No Further Investigation Consensus Statement, 1996; Operable Unit A, Part 2A Remedial Investigation Characterization Summary, 2001; Operable Unit A, Part 2A, Site Characterization Summary /Field Sampling Plan, 1995; Operable Unit A Preliminary Assessment Summary Report, 1991 and Interview Master Log, current edition.

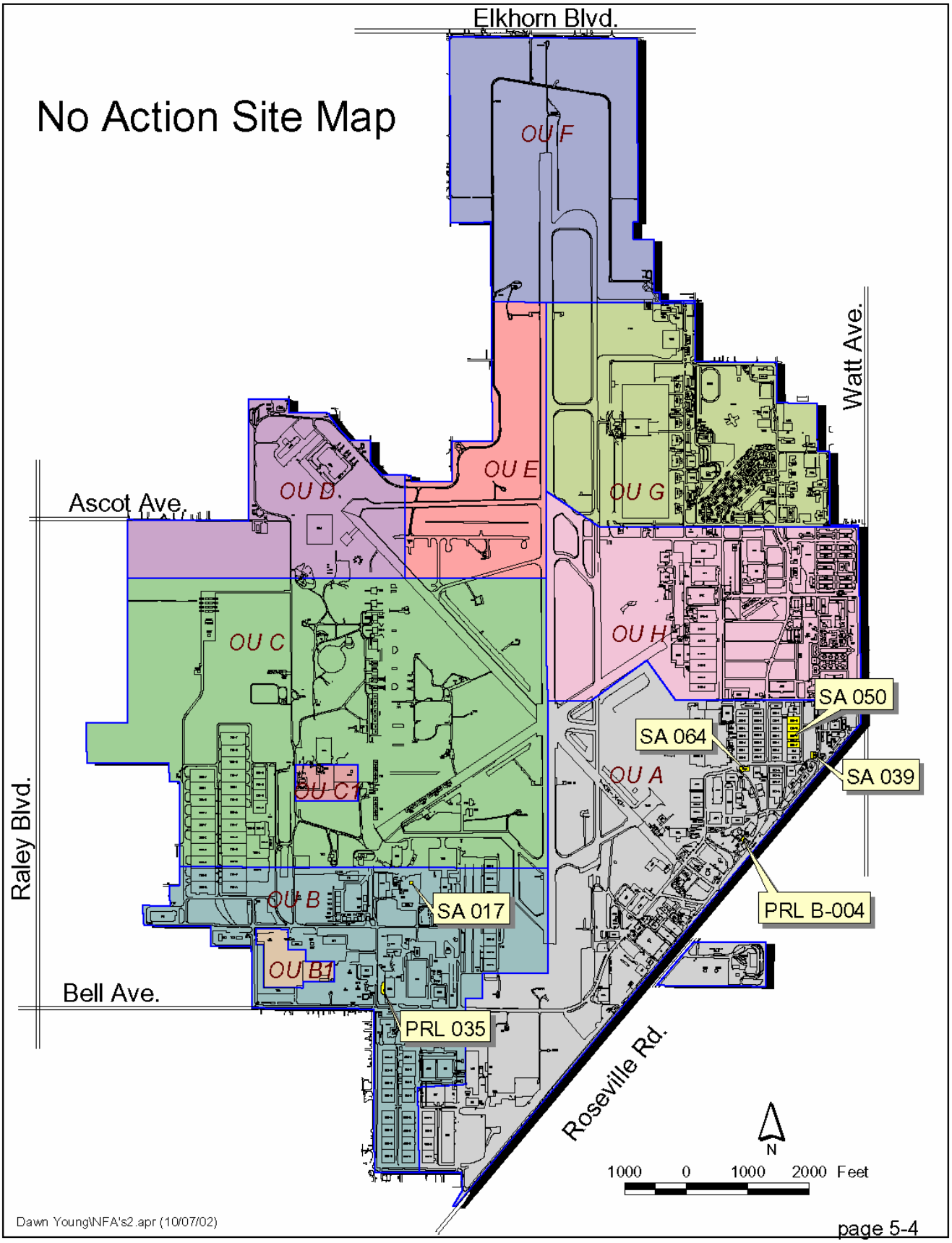
SITE 5: PRL 035 - (OU B)

This site was thought to be the location of a scrap metal burial pit during World War II. The site is an asphalt parking lot located near Building 652. Photographs that were reviewed, from 1943, 1946 and 1947, do not indicate that a burial pit was ever created. The area is shown as undeveloped grassland. Investigation for the site included metal testing of soil samples from five borings, site visits, interviews, a records search and aerial photographic reviews. Based on this work, no soil gas samples were collected at the site. There was no documented contaminant release, and no detected soil contamination in the results from the soil samples collected at the site. All borings showed no evidence of soil contamination. The investigation revealed no evidence or presence of hazardous substances. No action is recommended as results showed no contamination at levels that

require further action. The rationale for categorizing this site as no action is provided in: Remedial Investigation/ Feasibility Statement, Decision Document for Operable Unit B, 1991; Operable Unit B Technical Memorandum McClaren, 1986; Operable Unit B PA report, 1991; and Part 1 General Framework, Volume 2, Appendix J, Decision Documents - Operable Unit B No Further Action Decision Documents, 1997.

SITE 6: SA 017 - (OU B)

This site is the location of a former oil storage yard. The site is located northeast of Building 693. It was in use from the mid 1950s to the mid 1970s. The area is currently an asphalt pad. Soil and soil gas samples were collected from the site. No contaminants were reported in the soils at the site. Volatile organic compounds (VOCs) detected in the soil gas are not from the former oil storage yard. The VOCs are associated with groundwater contamination and are being cleaned up through the groundwater treatment plant. No action is recommended because no evidence of contamination from the oil storage yard was found. The rationale for categorizing this site as no action is provided in: Operable Unit B Remedial Investigation Characterization Summaries, 1995; and Operable Unit B Preliminary Assessment Summary Report, 1991.


No Action Site Map
Elkhorn Blvd.
Watt Ave.
Ascot Ave.
Raley Blvd.
Bell Ave.
Roseville Rd.
OU F
OU E
OU D
OU G
OU C
OU H
OU A
OU C1
OU B
OU B1
SA 050
SA 064
SA 039
SA 017
PRL B-004
PRL 035
N
1000 0 1000 2000 Feet
Dawn Young\NFA's2.apr (10/07/02)

Section 6
CURRENT AND POTENTIAL FUTURE SITE USES

The land and nearby facilities at the six sites are currently used for industrial activities. The same type of industrial use is projected in the future.

Section 7
SITE RISKS

There is no site risk at these six No Action sites. Either the site was not there or there was no contamination found at the site that posed any current or potential future threat. Cleanup work is proceeding with contaminated sites nearby the six No Action sites. The cleanup decisions and actions for the contaminated sites deal with the current and future risks associated with those sites.

Section 8
DOCUMENTATION OF SIGNIFICANT CHANGES

No changes to date

Section 9
REFERENCES

Agency for Toxic Substances and Disease Registry Public Health Assessment, Final Report, 22 March 1994

Interview Master Log, current edition

No Further Investigation Consensus Statement, 1996

No Further Investigation Consensus Statement Attachment 4, 1996

Operable Unit A Interim Basewide Remedial Investigation Part 2A-Site Characterization Summary/Field Sampling Plan, 2001; Group 4

Operable Unit A No Further Action Decision Documents, 1992

Operable Unit A No Further Action Decision Paper, 1992; located in Appendix J of the 1997 General Framework document

Operable Unit A, Part 2A Remedial Investigation Characterization Summary, 2001

Operable Unit A, Part 2A, Site Characterization Summary/Field Sampling Plan, 1995

Operable Unit A Preliminary Assessment Summary Report, 1991

Operable Unit A Site Characterization Summary/Field Sampling Plan, 1995

Operable Unit B PA Report, 1991

Operable Unit A Preliminary Assessment Summary Report, 1991

Operable Unit B Remedial Investigation Characterization Summaries, 1995

Operable Unit B Technical Memorandum, McClaren, 1986

Part 1 General Framework, Volume 2, Appendix J, Decisions Documents - Operable Unit B No Further Action Decision Documents, 1997

Preliminary Assessment for PRL S-23, 1991

Remedial Investigation/Feasibility Statement, Decision Document for Operable Unit B, 1991

Remedial Investigation/Feasibility Study Decision Paper, 1991

Remedial Investigation, General Framework, Operable Unit A, Appendix J, 1997

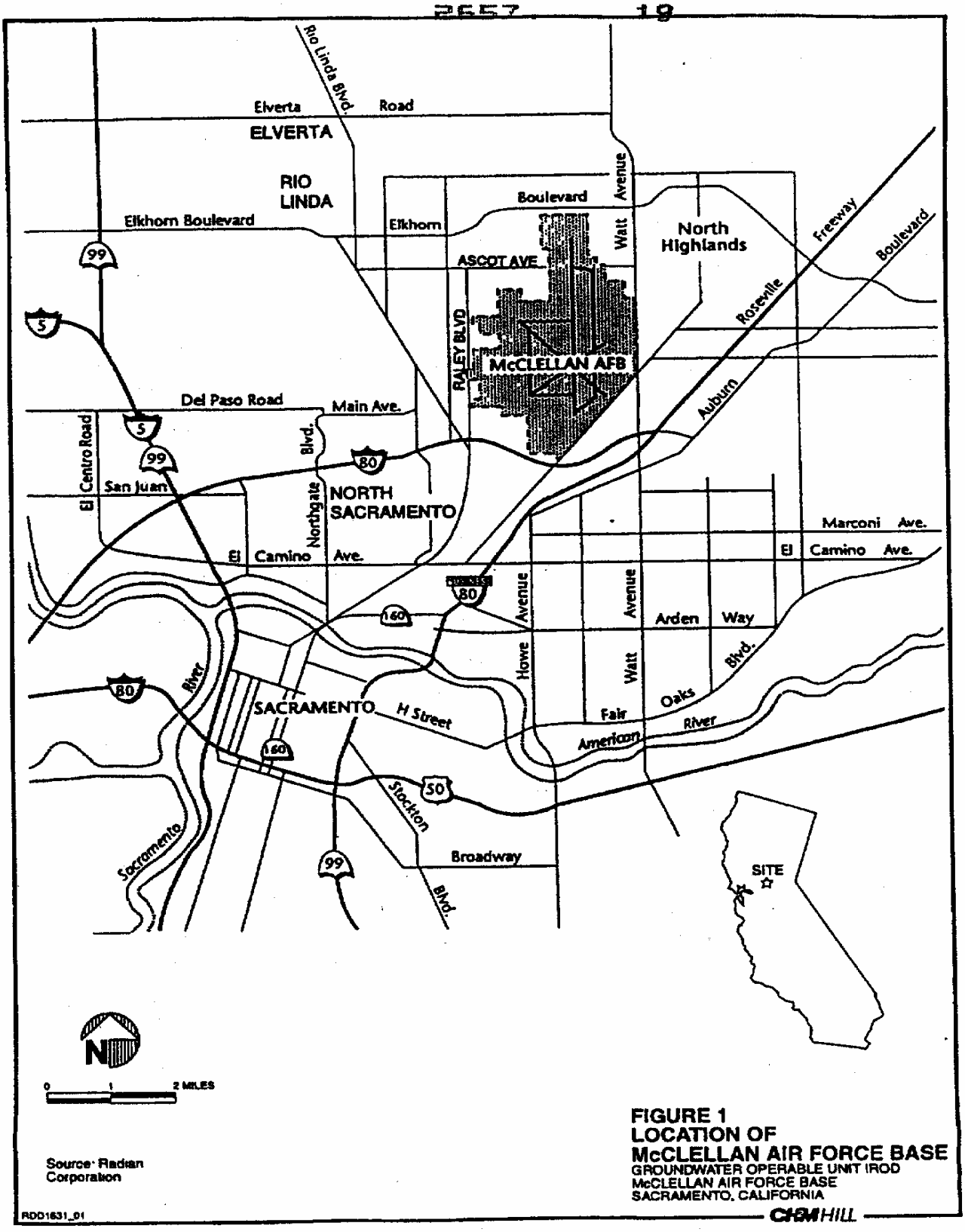
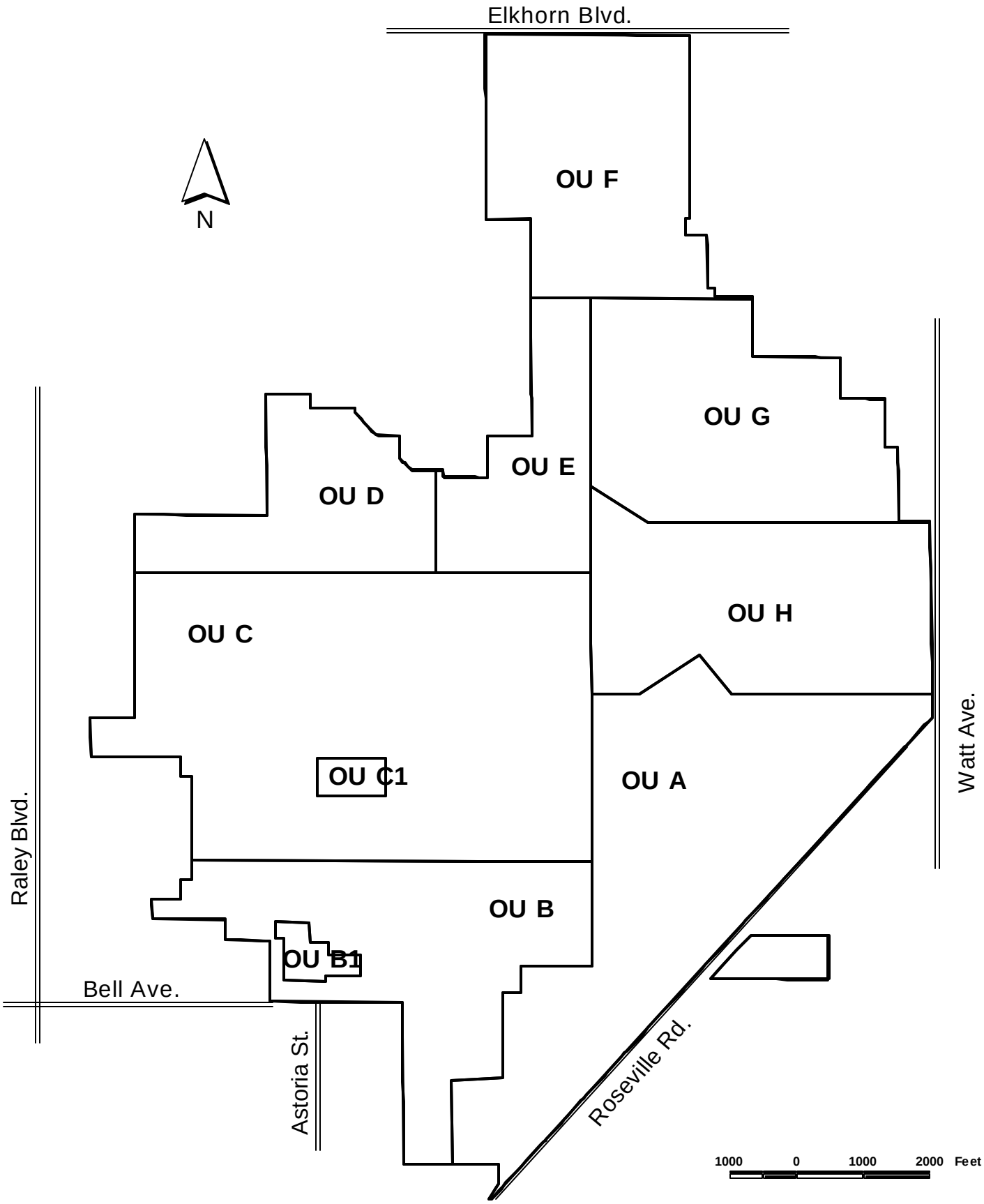


FIGURE 1
LOCATION OF
McCLELLAN AIR FORCE BASE
GROUNDWATER OPERABLE UNIT IROD
McCLELLAN AIR FORCE BASE
SACRAMENTO, CALIFORNIA

Appendix 1


Elkhorn Blvd.
N
OU F
OU G
OU E
OU D
OU H
OU C
OU C1
OU A
OU B
OU B1
Raley Blvd.
Watt Ave.
Bell Ave.
Astoria St.
Roseville Rd.
1000 0 1000 2000 Feet

Appendix 2

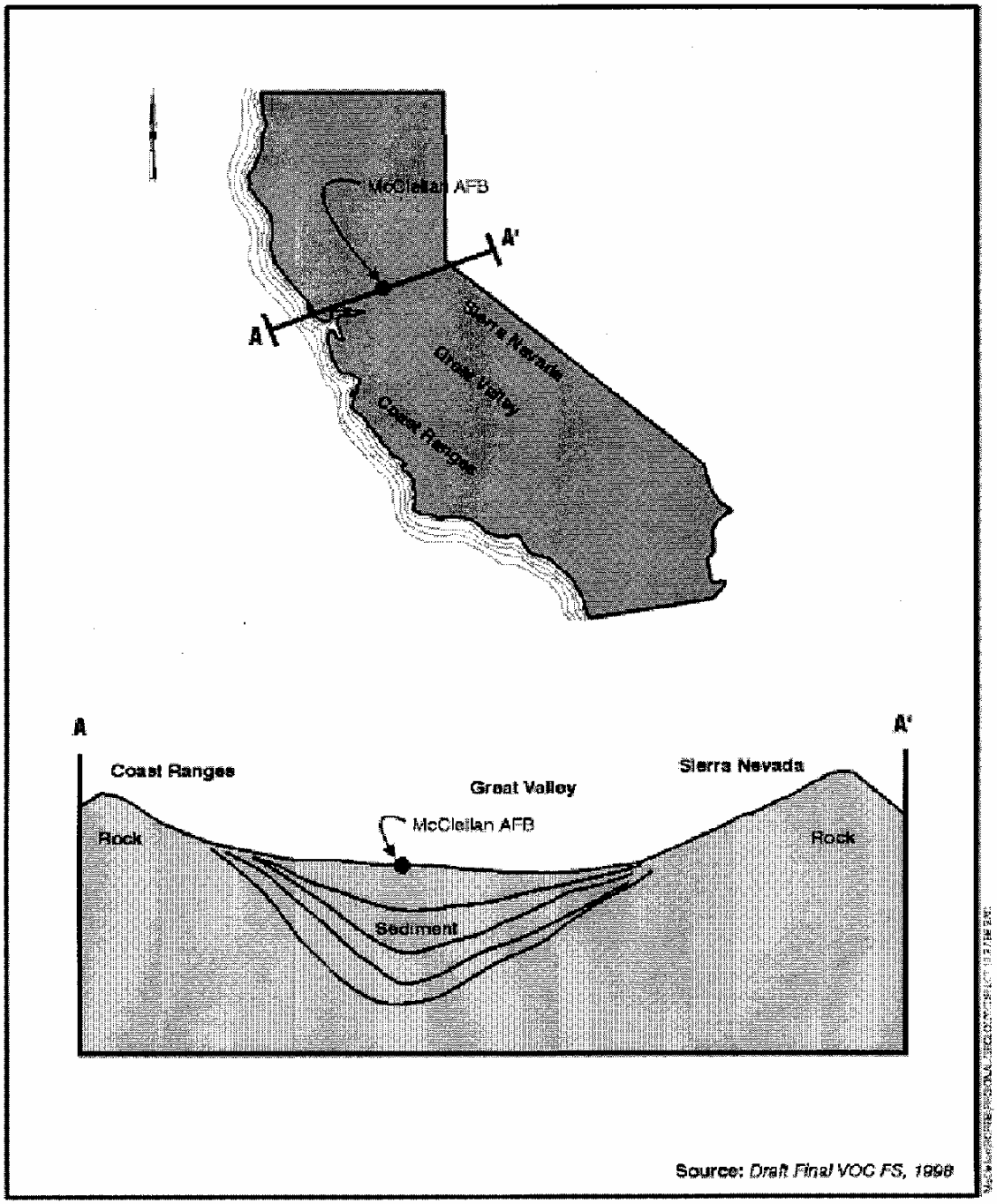
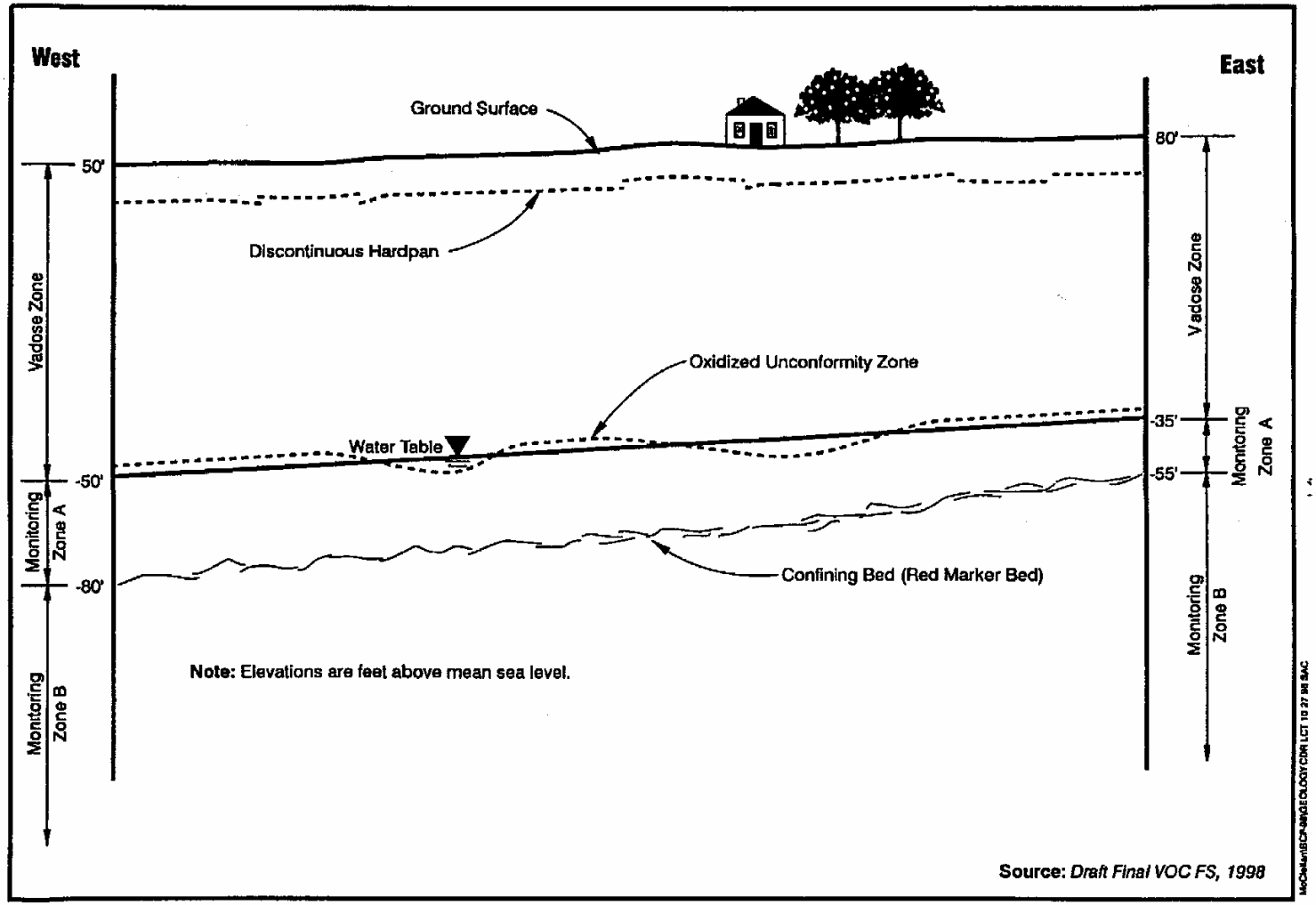


Figure 1-4. Conceptual Regional Geology

Appendix 3



Figur 1-5. Conceptualized McClellan AFB Geology

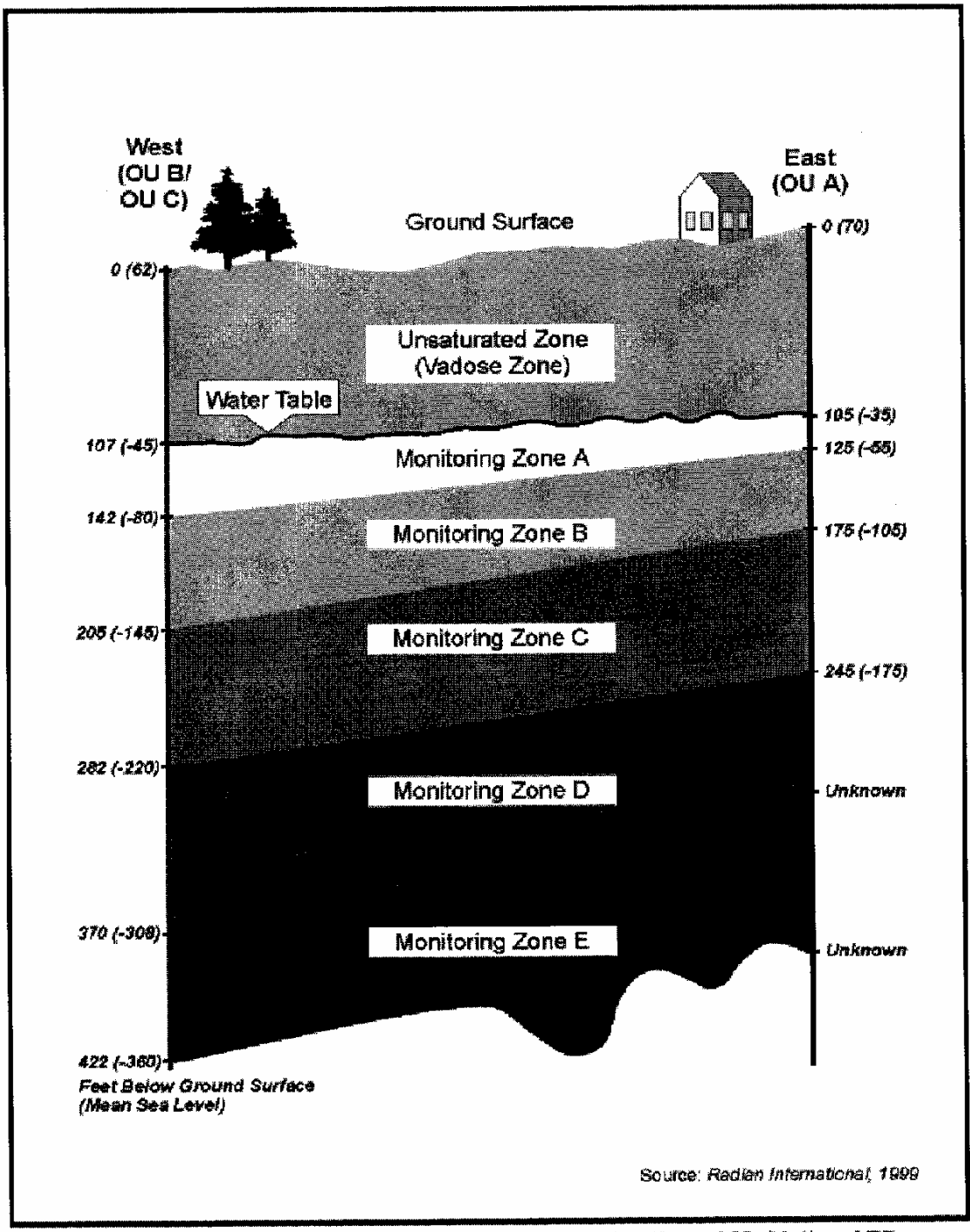


Figure 1-6. Generalized Hydrogeologic Cross Section of McClellan AFB

Appendix 5

RESPONSIVENESS SUMMARY

STAKEHOLDER ISSUES AND AIR FORCE RESPONSES

I. Comment Received from October 9, 2002 Public Meeting:

Mr. Arnold Roth comment: "I am curious why there might be some contaminated soil or groundwater contamination below these six sites. You won't permit drilling in them. Why not? If there is nothing bad about it, why don't you permit the drilling? If there is something bad about them, can you clean it up? How can you clean it up? And when will it be cleaned up, if there is no action on these sites? I retired from McClellan a number of years ago. And I was working on hazardous materials management there. I am concerned about this. I would like to see that we clean it up. If the six sites are not clean, why are they not clean? And can we clean them up in some way or is it no hazard? If it is no hazard, then why can't we drill it?

Air Force Response: Investigative studies at these sites have found that activities at these six sites have not caused soil or groundwater contamination at these six sites. Therefore, there is no work to be done at these sites and no need to continue investigative or cleanup work at the six sites. There could be groundwater contamination (approximately 100 feet below ground) and soil gas below the ground surface of the six sites; however, this contamination is from other sources. Since contamination could exist below the site, there will be a "no-drilling" restriction. The Basewide Volatile Organic Compound (VOC) Record of Decision will finalize cleanup decisions for groundwater contamination. Calendar Year 2005 is the planned completion date for the Basewide VOC ROD. The Air Force has the responsibility to take cleanup actions at any of the six sites should any new evidence be found that activities at these six sites caused contamination requiring cleanup action even if the land is transferred by deed to another party.

II. Comments Received via mail during the comment period:

1) Mr. Gary Sawyer comment: "Before the Air Force elects to take no further cleanup action at the proposed six sites, I request that the Air Force determine if any of these six sites were the site of (or very near) the early radionuclide laboratories operated by Tracerlab West, WFO, or any other Technical Operations Division predecessor.

On Pages 107-108 (attached) of the ATAC published written history entitle *Technical Operations Division Heritage Remembered*, there are several references to early Tracerlab West and WFO labs which sound like they may have been on or in close vicinity to some of the same buildings--or in or near buildings with the same types of functions--as buildings on the six sites under discussion for no further cleanup…especially sites SA 050, SA 039, SA 064 and possibly PRL B-004. Because some of the sites mentioned in both the *Proposed Plan of No Action for Soil Contamination at 6 Sites* and the *Technical Operations Division Heritage Remembered* refer to photographic film processing areas, cafeterias, and buildings in the 300-series located in the northeast corner of McClellan AFB, it may be important to know which specific buildings the early radionuclide laboratories (Tracerlab West, WFO, etc.) occupied or were in close proximity to on base. I strongly suggest that the determination of which buildings the early labs occupied not be based on the information contained in the Technical Operations Division's videotaped history--nor possibly the *Technical Operations Division Heritage Remembered* written

history. I, alone, researched, wrote the script for, and produced TOD's videotaped history. At the time, I had no reason to doubt its accuracy. However, now, based on similarities of information and wording in the later written TOD history and *the Proposed Plan of No Action for Soil Contamination at 6 Sites*, I am no longer certain I identified the sites of the early labs correctly in the videotape. Since the videotaped TOD history which I produced received wide dissemination throughout AFTAC and TOD--and preceded creation of the *Technical Operations Division Heritage Remembered* written history by several years--the locations and buildings mentioned in the written *Technical Operations Division Heritage Remembered* may have been based on the information in the prior videotaped history. Therefore, it needs to be determined that either: 1) the locations described in the videotaped (and/or written) history were indeed correct…or 2) the RAB's current assumptions as to the locations of the early radionuclide laboratories are <u>not</u> based on information in the videotaped version or the written *Technical Operations Division Heritage Remembered* version of TOD's history.

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Chief of Staff. It was the military organization for AFMSW-1and was commanded by MG Hegenberger. It moved from the pentagon for the first time to Gravelly Point, Washington DC during June.

1 Jun 1948 An interim long range detection system & network was set up following termination of the Sandstone test series. It consisted of 24 Air Weather Services WB-29s for aerial sampling, 22 Northern Hemisphere ground stations, and lab analysis operations by Tracerlab West (at least at McClellan). ← WHERE ON BASE?

It seems that this date, I Jun 1948, is the "best Guess" at the beginning of the LRD collection and analytical program operated by both military units and civilian contractors. ← WHERE ON BASE?

1 Jul 1948 The Special Weapons Group was transferred from the Deputy Chief of Staff, Material (DCS/M), to the Deputy Chief of Staff Operations (DCS/O) and was redesignated the Office of the Assistant Chief of Staff, Operations for Atomic Technology (AFOAT was born). This new organization moved during July to the Selective Service Building in DC. Also during July, AWS became the supply point for LRD program equipment and took control of all previous assets, equipment, and parts left over from the US test series.

28 Aug 1948 The 51st Air Force Base Unit was redesignated the 1009th Special Weapons Squadron (AFOAT-1).

By end of 1948 there were 55 WB-29s flying from Guam to the North Pole, 3 or 4 times a day.

Around late 1948 the Eastern Field Office was established at Fuchu AS, Japan.

In Aug 1949 the first 10 Ground Filter Units (GFU) were procured and deployed.

By the end of Aug 1949, the USSR had conducted their first atomic test.

3 Sep 1949 One of the routine WB-29 flights from the Far East to Eielson AFB, Alaska collected radioactive debris from this first USSR atomic test.

22 Sep 1949 President Truman announces the first USSR test to the public in a radio address.

From 1949-1950 the 1009th sent personnel TDY to McClellan to coordinate with 55th WRS (AWS) in flying sample missions and probably to interface with the civilian contractor. During this time frame, Tracerlab West operated the first lab at McClellan. ← WHERE ON BASE?

Around Jan 1950 the first radiochemical laboratory was opened at Eielson AFB, Alaska and was most likely operated by AWS. Sometime during the early 50s it was designated as Team 102, WFO.

In Mar 1950 the RPP network was initiated with one of the first units established in Jun 1950.

By Jul 1950 two systems of Collecting air samples between 1,000 and 30,000 feet had been developed. One collected a sample in 20 minutes, the other in 100 minutes. Both brought outside air inside the airframe without contamination and were completely controllable from within the aircraft.

[redacted]

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Appendix

In the Fall of 1950 The Western Field Office (WFO), the first permanent unit at McClellan was created. It was housed in a facility in the vicinity of what is now the base cafeteria. ← WHERE ON BASE?

By the close of 1950, logistical support for procuring specialized, Atomic Energy Systems equipment directly within the organization was added to the WFO. This function was housed in a modified Building T-39.

In late 1950 and early 1951 the first dedicated "B" system seismic station was brought on line near College, Alaska.

In Jan 1951 the WFO began working with Tracerlab West in operating the chemistry and counting lab for the first time. It is believed this first "AFTAC" lab was housed in what is now Bldg S-334, located near the north end of what is now the base photo lab complex. ← WHERE ON BASE?

In the early 1950s the Central Field Office was established at Wheelus AFB, Libya.

In July 1952 McClellan Central Laboratory was born in name and became responsible for much of the work previously performed by Tracerlab West.

By late 1952 supply support and chemical storage were moved to a modified Bldg T-740 at Camp Kohler and a modification was done to another WFO building.

23 Jul 1953 The Central Field Office moved from Libya to Wiesbaden, Germany.

In 1953 the WFO HQ moved into a building also near the base photo lab complex. ← WHERE ON BASE?

In Mar-May 1954 a new method of obtaining whole air samples was developed using a high performance compression and a SPHERE sample container. The sampler was called the P-84 system and was first installed on F-84 aircraft.

In early 1955 routine lab sample counting was done using conventional-type Geiger counters (SC-9s). Eighteen methane-End-Window (MEW) proportional flow counters were procured and performance found to be superior to the SC-9s. Conversion to the MEWs was accomplished. (The MEWs were replaced by Sharps beta/alpha detectors and they in turn were replaced by our current, Nuclear Data detectors.)

Aug 1955 Two 100-channel alpha pulse analyzers were procured (one was on loan from Los Alamos Scientific Laboratory). These were the forerunners of DLR's Solid State Alpha Spectrometry System.

In late 1955 an additional enlargement of the lab occurred ← WHERE ON BASE? and base CE was given money to construct a HQ building at the WFO.

Around 1957 Maj Keith Hamby, Lt Michael Lubin, and Airman Donald Paisley began assembly on the first mass spectrometer in Bldg S-334. It was to become fully operational before it was disassembled and moved to Bldg 628. ← WHERE ON BASE?

1957 The Special Equipment Operations (SEO) course was initiated.

Air Force Response: The Air Force has used multiple sources (interviews, historical photos, and AF documents) to determine if any radiological activities occurred at these six sites. The Air Force did not just use the AFTAC written history or videotape. To date no evidence has been found. The Air Force, EPA, and State regulators have developed a new basewide McClellan radiological conceptual model and numerous radiological investigations are underway and planned for McClellan. Additional sites may be found that will require cleanup. The results from these investigations will be finalized in future RODs. The Air Force has the responsibility to take cleanup action at any of the six No Action sites should any new evidence be found that activities at these six sites caused contamination requiring cleanup action even if the land is transferred by deed to another party.

2) Mr. Dennis M. Chinnock comment: "SA 039 is in the vicinity of a building that was used in the analysis of radioactive debris in the 1950's, 1960's and 1970's. Paving and building construction in 1986 would have altered the terrain. The proposed plan indicates soil samples were analyzed for petroleum products. No mention is made of radiological sampling. I would think it prudent for analysis of soil samples for typical radioactive isotopes that are consistent with atmospheric and underground atomic tests. Recent Sacramento Bee articles have indicated that such debris was brought onto McClellan.

Air Force Response: The Air Force has not taken radiological samples at SA 039. The Air Force has used multiple sources (interviews, historical photos, and AF documents) to determine if any radiological activities occurred at this site. There are indications that radiological activities did occur somewhere in the vicinity of SA 039. The Air Force, EPA, and State regulators have developed a new basewide McClellan radiological conceptual model and numerous radiological investigations are underway and planned for McClellan. One of these additional investigations is for SA 58, which is near SA 039. Contamination may be found near SA 039 that will require cleanup. The results from these investigations will be finalized in future RODs. The Air Force has the responsibility to take cleanup action at any of the six proposed No Action sites should any new evidence be found that activities at these six sites caused contamination requiring cleanup action even if the land is transferred by deed to another party.

3) Mr. Gary Collier Comments:

B-004 - "It appears highly unlikely that soil contamination exists at this site. Wouldn't it however seem prudent to pursue limited sampling to definitively rule out wide spread contamination based on objective evidence prior to transfer to protect the interests of the Federal Government?"

Air Force Response:

Agree, it would be highly unlikely that soil contamination exists at this site. Based on the evidence found to date for this site the Air Force does not believe the cost expenditure for additional sampling is warranted.

064 - Operable Unit A - "Analysis indicates that there is no obvious conduit for contamination of soils. Has the sanitary sewer system been considered as a conduit for contamination? Was this site connected to the notoriously leaky Industrial waste line? Documents indicated that large amounts of acids and other contaminants were diluted and flushed down the sanitary sewer system. Is this sort of contamination covered under a different ROD? Concrete is normally porous. Please explain how foundation was constructed."

Air Force Response:
Agree, analysis indicates that there is no obvious conduit for contamination of soils. Sanitary Sewers do leak; however, to date the Sanitary Sewer has not been identified as IRP cleanup site. There is an Industrial Waste line is close proximity to site 064.

Although this proposed plan is not intended to address sewer line contamination (see the first paragraph of the *Proposed Plan for No Action for Soil Contamination at 6 Sites*), the sewer system is being considered as a conduit for contamination in two senses. First, photo-developing chemicals from the Microfiche Service Center were disposed of in the drains to the sanitary sewer. However, the disposal procedures at this facility required dilution of the chemicals to concentrations below sewer discharge limits, so materials disposed down the drains would not have constituted hazardous waste. Second, the sanitary sewer system is being investigated for radioactive contamination under a separate effort. Building 353 was used to store radioactive components. However the building has been surveyed and no evidence was found for a release of radioactive contamination either directly to the environment or via the sewer. The California Department of Health Services has released the building for unrestricted use as it relates to radiation.

Although there are sections of the Industrial Waste Line (IWL) in the general vicinity, Building 353 was not connected to the IWL.

As mentioned in the Proposed Plan, there have been no reported contaminant releases at building 353. While concrete is porous, it takes time for fluids to permeate through solid concrete. Typical mechanisms for contamination to get below a concrete barrier are (1) prolonged exposure to fluids as would happen with a constant drip, a release/spill left unattended or storage of standing fluids in an underground storage tank or sump; or (2) via cracks or utilities conduits. Visual inspection of the building shows no evidence that any of these conditions exist at Building 353, so it is considered unlikely that contamination that may have been released inside the building penetrated the concrete to reach the soil beneath. In addition, construction drawings and specifications for this building show that the foundation consists of a four-inch concrete slab covered by linoleum, carpet, and/or tile. The Air Force believes that this provides an adequate barrier to any short-term releases that may have occurred in the Microfiche Service Center.

039 - "Concur"

Air Force Response:
Agree

050 - "Without soil testing, it is impossible to clearly dismiss potential contamination without solid and objective laboratory evidence."

Air Force Response:
Do not agree that laboratory analysis is needed to list this site for No Action. Investigations have revealed that only small amounts of PCB within electrical units were ever within the facility. No evidence of leakage is present or has been identified.

035 -" It is quite unlikely that such a practice occurred during much of World War II. During this time there were extensive shortages of war materials of which steel was of obvious need. Large scale recycling had been instituted through the Civil Defense

Authority. Shortages of materials continued until the conclusion of hostilities. (References upon request)"

Air Force Response:
Agree, the likely hood of a scrap metal site being used during this time frame is remote.

017 - "Concur"

Air Force Response:
Agree

TECHNICAL AND LEGAL ISSUES

None to date

ATTACHMENTS

Attachment 1 - Administrative Record Index

Attachment 2 - Reporter's Transcript, Public Hearing No Action Proposed Plan Public Meeting for the Former McClellan Air Force Base, October 9, 2002

Administrative Record Index
(These locations can be found in the McClellan AFRPA Web Site at http://www.afrpa.hq.af.mil/mcclellanem)

AR/IR #	TITLE	DATE	TYPE	AUTHOR
IR 2281	Public Health Assessment, Final Report	Mar 22, 1994	Report	ATSDR
AFRPA Admin Lib	Interview Master Log, Current Edition	Dec 2001 with qrtrly updates	Report	URS
IR 3356	No Further Investigation Consensus Statement, 1996 (located in OU A RI, General Framework)	Jun 1997	Report	Radian
IR 3356, page 741	No Further Investigation Consensus Statement, Atch 4, 1996 (located in OU A RI, General Framework)	Jun 1997	Report	Radian
IR 4262-4275	OU A Interim Basewide Remedial Investigation, Part 2A - Site Characterization Summary	Sep 2001	Report	Jacobs
IR 3356, page 451	OU A, No Further Action Decision Documents, Feb 1992 (located in OU A RI, General Framework)	Jun 1997	Report	Radian
IR 4262-4263	OU A, Part 2A, Interim Basewide Remedial Investigation Characterization Summary	Sep 2001	Report	Jacobs
ESF-AFRPA Admin Lib	Draft OU A Preliminary Assessment Summary Report	Feb 1991	Report	Radian
IR 2795-2800	OU A Interim Basewide Final Report, Site Characterization Summary/Field Sampling Plan	Nov 1995	Report	Jacobs
IR 1795	OU B Preliminary Assessment Summary Report	Oct 1991	Report	Radian
IR 2826	OU B Remedial Investigation Characterization Summaries	Dec 1995	Report	Radian
IR 704	OU B Technical Memorandum	Feb 1986	Report	McLaren
IR 3356	Remedial Investigation, Part 1, General Framework, Vol 2, Appendix J, OUB No Further Action Decision Documents, Sep 1991	Jun 1997	Report	Radian
IR 2843	Remedial Investigation/Feasibility Statement, Decision Document for OU B	Sep 1991	Report	Radian
IR 3356	Remedial Investigation, Part 1 General Framework, Vol 2, Appendix J, OU A, No Further Action Decision Documents, Feb 1992	Jun 1997	Report	Radian
IR 2843	McClellan AFB Decision Documents	Dec 1995	Report	CH2M Hill
ESF -	Response to Comments Tables	Dec 2002	Report	AFRPA/DD-

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AIR FORCE BASE CONVERSION AGENCY

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PUBLIC HEARING

NO ACTION PROPOSED PLAN PUBLIC

MEETING FOR THE FORMER

McCLELLAN AIR FORCE BASE

REPORTER'S TRANSCRIPT

OCTOBER 9, 2002

6:00 P.M.

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Reported By: Jacqueline Hale, CSR No. 12538

APPEARANCES

Dawn Young

Buddy Walser

Kevin Depies

Glen Kisner [Glenn Kistner]

MS. YOUNG: Okay. It is 6:00 o'clock. Shall we get started. If everybody could take their seats. I'll introduce myself, my name is Dawn Young. I am the Community Relations Program Manager for the Air Force Base Conversion Agency at McClellan. What that means is I am the person that interacts between the environmental cleanup at McClellan and the public.

Tonight we are here for the No Action Proposed Plan Meeting. The comment period for this started September 18th and it goes to October 18th. Tonight you will have a chance to make an official comment on the proposed plan, and then you also still have a chance to write in your comments until the 18th of the month. In the back on the table there is an official comment card. If you would like to make an official comment, please fill out your name. And then we'll call you to the podium, and we will give you that chance where you can make your comment. You can get the cards from the back table or else Roxanne and Melinda in the red jacket will also take the cards from you.

We did put in a public notice in the papers on September 18th. Those papers were the Sacramento bee; the News, it goes for Rio Linda and El Verta; and then also North Highlands News.

We'll now get started. I'll brief the background of McClellan and then also what the proposed plan is. And then

I'll mesh that together into the No Action Proposed Plan. First, we'll look at just a brief background on McClellan. As you can see it was established back in 1936, and then it closed on the 13th of July 2001. During that 65 years timeframe, the base had a lot of missions. As you can see by the number of acres, it was a very large base as these places go. And with all of those different operations, there was a variety of different chemicals that were used to support those operations. The chemicals were used, stored, and handled at McClellan, and then also eventually disposed of at McClellan. The chemicals that we are talking about range from cleaning solvents to paint that make the dials glow on the aircraft. And it was actually the disposal of these chemicals which lead to the current soil groundwater contamination that we see today. We first encountered contamination at McClellan back in 1979. That's when we noticed that the groundwater was contaminated. At that time we started conducting public interviews to find out any more information about the contamination.

Then in 1987 we were put on the National Priorities List. And what that means is it brings the Base to the forefront of the folks' mind so that we can get priority for funding. And it also makes the knowledge that the Air Force understands that the Base is contaminated and we are trying to clean it up. Once we were put on the National Priority

List, we really stepped up our public involvement. And we really started conducting a lot more interviews, historical research, and items like that to find out exactly what was contaminated on McClellan. And when we did that, we came up with 318 possible contamination sites on McClellan and that is current as of today.

Now where the proposed plan comes into play with the contamination. With the contamination in the NPL site, we now fall under CERCLA, which is the Comprehensive Environmental Response Compensation and Liability Act. This poster over hear actually shows the CERCLA process. Under CERCLA, it really sets the procedures on how we conduct the clean up to make sure it's done correctly. And also it ensures that the community is involved. And that's a very big part in the CERCLA process to ensure the public does have a say so.

If you look at the first part of the poster it talks about the investigative work. That's where we found out our 318 sites, that was the investigative work that we started to do, to see if the sites were contaminated or not. From there, we go into the feasibility study, which is where we would look at the different ways to deal with the contamination.

Then as you can see, the next step would be over to the proposed plan. And the proposed plan weighs very

heavily on public input. Documents were developed that explains the sites. And I am sure that all of you have received the proposed plan in the mail. If not, we have some on the back table. And you can see that the sites are in there, and it explains about the six sites. And it's explained hopefully in a sense where you can understand it and are able to communicate your questions to us. We try to make sure that it's a readable document, not as technical as some of these documents that we will have on display that you can look at if you care to.

Now, with the proposed plan by the CERCLA law we have to have a 30-day comment period, which as I stated earlier goes from September 18th to October 18th, and then we have the public meeting. And all of these things are to ensure that the public has a chance to make a comment because we do want to hear what the public has to say about these six sites.

Now, the public is also encouraged to look at the investigative documents that we have uncovered that support the idea that these six sites are clean. And at McClellan we have site folders for these six sites that show all of the investigative documents that we have uncovered that support our documentation. And those are open to the public for people to come and look at. And we also have a copy of those site folders here on the back of the table, if people

would like to look at them tonight. If they don't have a chance to come to McClellan, they are here right now. Now, these site folders and all of the investigative work that's been done at McClellan, through the environmental cleanup, is located in the information repository. And there is a fax sheet on the back table also that looks like this, which actually shows you where it is located on McClellan and how to get there and the hours of operation.

Now, in the proposed plan it calls for a comment time, and that is when you can come up to the mike and make your comment. Now, your answers will not be given tonight. Those answers will be in a responsiveness summary, which is located in the Record of Decision. As you see in the CERCLA poster, it's the next block over where it says "ROD." That is the legal binding documents. That's where your comments will be located. Now, the ROD, once it gets signed, will be in the Information Repository, which is this flyer which is back at McClellan which you can come and review.

Now, I want to point out also that the proposed plan is not a transferred document. It's not that we are transferring the land, the owners of the land, to another property. It is just a proposed plan where we are saying that these sites are clean. It's not the deed transfer or anything like that. We want to make sure that people understood that. Okay.

So, now, I'll take the proposed plan and mesh it with what's happening at McClellan and why we are here tonight. The Air Force feels that the six sites that were in the proposed plan, that you have all seen, should be removed from that list of 318 possible contaminated sites that we found at McClellan. Now, the Air Force feels that there is no source of contamination at these sites.

Remember I told you that it's not the transfer, the deed transfer, this is just the site that we are talking about, the six sites. Down the road when the property goes to be deeded over to the county, which is eventually where it goes and then the county deeds it over for McClellan Park for reuse, at that time there could be some rules put into place what we call "institutional controls" to keep the workers and the community safe; for instance, groundwater. Say someone wanted to put a well on the middle of the site. Well, because we all know that there is groundwater contamination, that would be an institutional control where there would not be allowed to put any wells on the site. Okay. Or there could be pollution that's migrating from a different site over into one of the sites, which would cause that to have contamination, but it's not contamination from that source at this site. So at that time we would put on an institutional control to ensure that there is no harm that would come to the workers or the community.

As you can see on this slide, these are the steps that we took when we took the criteria to locate our six sites. We have done a lot of interviews and historical document searches. Like I said, there is no contamination at these sites or the site just didn't exist. What that means is that someone during an interview told us "Hey, I recall them dumping X-Y-Z at this spot." Well, when we did the investigative work, it was determined that that was never at that spot. That is what it means by "never existed." And I also want to point out that this proposed plan does not cover groundwater or sewer line contamination. And those two items will be covered under their own proposed plan and their own ROD. So this is just the site.

And like I said, the proposed plan and the whole CERCLA process is to get the community involved and now is when we want to here from you. We want to hear what you feel. You don't have to agree with what we feel. You know, this a chance to hear what you have to say. We want you to come to the Information Repository and look at the site folders and look at the investigative work that we have there and look it over. That's what we want. We want you to come out and give us your opinion and tell us if you think it's clean. We want to hear that. And remember the comment period doesn't end until October 18th.

And then for the CERCLA process, the next step

would be the remedial decision, which is how we are going to clean it up. But because we already feel these sites are clean, we will skip over that process. And basically, we are done with the CERCLA process. And we'll go into the deeding eventually down the road. And then hopefully we'll take our six sites away from our 318 sites and now we will have 312 sites.

And now I am going to introduce Buddy Walser. He'll come up here and actually go over the more specific items of each of the six sites. Also, in the back room the six sites are listed back there. Once Buddy is done, then we'll go and take some clarifying questions. Also the regulators, we have Kevin Depies from DTSC and Glen Kisner [Glenn Kistner] from U.S. EPA, and they will stand up to make a brief statement also about how the regulators feel, how they concur with the six sites that are clean, and then we will go into the public comment period. So hears buddy.

MR. WALSER: Good evening. As Dawn said, my name is Buddy Walser. I am the Remedial Investigation Manager for McClellan Air Force Base. I'm going to go into, first, what the criteria were for including these sites in the No Action Proposed Plan. This just reiterates the criteria that Dawn told you a minute ago. And then I'll go into a discussion of our rationale for why we think each of these sites is not a source of contamination.

The criteria were that there is no contamination from the site. And I don't want to mislead anybody when we say "The site is clean" or "There is no contamination." What we are saying exactly is that there is no contamination from this site. There may well be contamination in the groundwater beneath this site. There may be contamination that has diffused from the groundwater into the soils beneath this site. There may be contamination from adjacent sites that have migrated from these sites and that contamination is not why these sites were designated in the first place. So all we are doing, in this case, is saying that we have looked at our historical records and taken in some cases, some samples, and we have determined that the initial proposed or believed release of contamination didn't occur there and that there is no contamination from these sites.

The other possibility is, as Dawn pointed out, we actually went out looking for one of these sites. We had an interview result or something in an historical record that said there might have been a release at such and such a place. And when we went looking for it, we simply couldn't find it. And that's the only two kinds of sites that got into this list of six sites.

And so the first site that I'm going look at, I'm going to follow the same order that's in the proposed plan.

And what we'll do is put up a locator map of the site, and then we'll go through the rationale for why we believe these sites are not sources of contamination. And we'll just follow same order that's in the proposed plan.

The first site is PRL B-004. And it was originally believed that this might have been in a place where sludge from the Base's sewer treatment plant was spread out to dry. The basis for that belief was a 1937 construction drawing that said this is where they were going to put the sludge drying beds for the sewer treatment plant. 1937 is when they were actually building the Base. And this is a drawing that was probably a plan for where they intended to put these sludge drying beds. We found that drawing in an early investigation, and then later we had an interview with somebody in our Civil Engineering Department, the Air Force's Civil Engineering Department at McClellan, that confirmed that the drawing did show that the beds would be in this location. However, when we went through all of the records that we had in Environmental Management and in Civil Engineering, we could not find any records of sludge drying beds actually having been in this location. We also looked at a series of aerial photographs that covered the period 1928 through 1989. And no sludge drying beds were evident at this location in any of those photographs during any period. In 1928 the area was shown as open land, that was

before the Base was being constructed. 1940, slightly after the Base had been opened, and in 1941 and 1943 it showed the sewage treatment facility but no sludge drying beds at this site. And in 1946 we see the first sludge site, which is at a different location north of Building 326. After that the aerial photographs from 1949 to 1989 don't show any change from that. The sludge drying beds are in the location north of Building 326 and not at this site. Based on that, we believe that there were never sludge drying beds at this particular site.

Next site I would like to talk about is SA-064. It's at Building 353. There were two activities at Building 353: A cafeteria at the west end of the building, and at the east end of the building was a Microfiche Service Center. And the reason that this site was proposed as a contamination site is that they used, stored, and disposed of photo chemicals at this site. And the method of disposal that they used at the site was to dilute the photo chemicals after they had been used and to rinse them down the drain.

We conducted site visits in 1990, 1991, 1992, and 1995 and found no visual evidence of contamination, no stain, or discoloration anywhere that would have indicated use of photo chemicals or disposed of photo chemicals at the surface. And the site is on a concrete pad with no apparent conduits to the soil. What I mean by that is there are no

cracks, drains, hole that would have allowed anything that was released at the surface to get through the concrete pad to the soil beneath. In addition there are no low-lying areas where materials would have pooled and potentially seeped through the concrete.

Interviews with the people who worked in this area and people who oversaw this area indicate that during the entire period that it was operating as a Microfiche Service Center, the way they did dispose of these chemicals was down the drain after dilution and that this was done in accordance with all of the appropriate health and safety requirements that were in effect. And so based on that, we believe that this site is not a source of contamination to the environment.

I would like to look at site SA-039. This is a site where we actually know that we did have a release of contaminations to the environment. It's a slightly different category. In 1986 this area was a parking lot and Building 29 was being constructed. In the process of that construction of that building we found an area where motor oil had seeped into the soil of the parking lot. The soil was discolored, a gray color. We took some samples and confirmed that, in fact, this was an oil release. And during the process of constructing Building 29, the oil, which affected only a small area of soil, was excavated and

the hole was back filled with clean fill. Subsequently, we went back and took some soil samples and analysed for petroleum at that location and found no residual petroleum. So we believe that the spill that did exist there in 1986 was removed as part of the construction Building 29 and that there is no longer petroleum at this location. This is a site where we do have groundwater contamination beneath the site. It's over one of our groundwater plans, but there is no indication that this site was the source of groundwater contamination.

Next site I would like to talk about is SA-050. This is a building on Base. One of the warehouses that was used on Base, and then later turned into office space. This site comprises Building 263, B Bay through F Bay. And the reason it was initially put on the list as a potential site was that in B Bay they had dealt with electronic equipment that might have contained PCB's. We went back and conducted a series of interviews and site visits and determined that, first of all, no hazardous materials were used, stored, or disposed of in Bays C through F so that there was no potential for release from those locations because there simply were no materials there. It then turned out that the only source of PCBs that were handled in B Bay of building 263 were computer power supplies which contained a small amount of PCBs. And these PCBs were handled only in the

power supply. They did not dismantle the power supplies or move PCBs nor did they handle PCBs as a commodity that they would add to the power supplies. So the only place that these PCBs were used were actually inside the computer power supplies.

Finally, we conducted a site survey in 1990 and found that the building has a concrete floor without drains. So any spills that occurred in B Bay would have remained on the top of this concrete pad. We believe that in the course of doing business if they had spilled something on the pad, they would have cleaned it up so it would not have sat on the top of the pad and had an opportunity to seep through. So the lack of drainage, the lack of other conduits, between the top of the pad and the soils underneath indicates that PCBs, if small amounts were released during these maintenance activities, would not have reached the soil.

Next site, PRL-035, has a slightly longer story. Why don't you go ahead and put up both slides, Rox. Thank you. This site was originally added to our list of sites because it was reportedly to have been scrap metal burial pits. Specifically, the scrap metal that we are talking about are strapping bands from shipping crates from the World War II era. These bands were apparently removed from the shipping crates and disposed of to this site or at least reportedly that was done. We conducted a series of

investigations including review of aerial photographs and some data collection at the site. And what we found was that there is no evidence of any kind of an excavation at this location during the World War II period. We looked at aerial photographs from 1943, 1946 and 1947, and there is no evidence of an excavation on those photographs. We also conducted a ground-penetrating radar survey of this area to see if we could locate the site and identify an area that we thought might be an area of disturbed soil. So we went out and collected soil gas data at that area. And we identified only very low levels of soil gas by soil borings. We said there did not show any evidence that the soil was distributed. And what that means is that when we took these soil samples, the soil in this area looked like the soil in the area around it. So that we don't believe that they actually had made a burial pit at this site.

Soil borings also show low concentrations of soil gas. We collected them at a later date, 11 soil gas samples, and again detected volatile organic compounds. But we don't believe that those compounds are from this site. There are two reasons for that. One is that this site was not reported as a general purpose burial pit, and it was not used for industrial activity. It was supposed to be a place where scrap metal was buried. So we would not have expected to find organic chemicals there like solvents, oils, fuels.

So the fact that there are those kinds of chemicals at this location, we think, is not due to this original reported activity. The second reason is that there are two sites that literally overlapped this site where the chemicals may have been released from. And, in fact, we have attributed the solvents that exist at this site to PRL S-034 and PRL L-6.

One last site that I would like to chat with you about for a second. This is SA-017. It's just east of Building 688. From 1955 to 1974 it was an oil storage yard. It was an open yard where oil was stored. And it wasn't a building or a pad, it was just an open yard. We conducted some investigations, first of all, to determine by a historical record search that the only chemicals that were handled at this site as far as we can determine were the petroleum chemicals. We conducted a visual inspection of the site and found no evidence of contamination or spills. And finally, we drilled four borings at this site in 1995 and took 52 soil samples and 9 soil gas samples and none of these samples showed contamination at this site. This site, we believe, was not a source of petroleum contamination. And that covers the six sites and the rationale.

MS. YOUNG: Okay. Now, following the agenda we will have the regulators make their statement. If Glen Kisner [Glenn Kistner] could please come up from the EPA.

MR. KISNER [KISTNER]: Good evening, I'm Glen Kisner [GlennKistner] from the Environmental Protection Agency, Remedial Project Manager at McClellan. And I would like to say that EPA has examined the evidence provided for these sites and we concur with the six sites Proposed for No Action.

MS. YOUNG: Thanks, Glen [Glenn]. And now we have Kevin Depies from DTSC.

MR. DEPIES: Good evening, like the EPA, the DTSC has also thoroughly examined the information that has been presented and, we also concur with the No Action for these sites.

MS. YOUNG: Thanks, Kevin. Now, we will have a chance to ask any clarifying questions from the public. This will be the last time that we will have any actually dialog with the public before we go into the official comment period. So if anyone has any clarify questions, they can come to the mike and ask them at this time.

MR. ROTH: I'm Arnold Roth. I am curious why there might be some contaminated soil or groundwater contamination below these six sites. You won't permit drilling in them. Why not? If there is nothing bad about it, why don't you permit the drilling? If there is something bad about them, can you clean it up? How can you clean it up? And when will it be cleaned up,

if there is no action on these sites?

MS. YOUNG: Okay, Arnold, that was more for the office public comment period. So if we could have you state your name and spell your last name, we will take that down for the Responsiveness Summary. And we will include that comment into the Record of Decision, which is the legal binding document. And then that way, we can have your answer there, okay.

MR. ROTH: Arnold Roth, that's A-r-n-o-l-d, R-o-t-h. I retired from McClellan a number of years ago. And I was working on hazardous materials management there. I am concerned about this. I would like to see that we clean it up. If the six sites are not clean, why are they not clean. And can we clean them up in some way or is it no hazard? If it is no hazard, then why can't we drill it?

MS. YOUNG: Thank you. Is there anybody else that has a comment, a question? Thanks.

MS. MOORE: Hi. My name is Angela Moore. And I just had sort of a question about your slide on PRL-035. It appears to me, on a quick glance, that it differs from the information in the text that I have here slightly. The text that I have, I couldn't find any mention -- they said that no soil gas samples were collected at the site in my text, on page 4 under that.

But on your slide, it said 11 gas samples were taken but the soil gas contamination was attributed. I'm just wondering -- it just appears to be a discrepancy there to me.

MR. WALSER: Yes, it is. And the best I can offer you is that I believe that the Proposed Plan text is in error. You can go and look at the folder that we have for this site in the back of the room. We can do this afterwards, if you like. I'll show you the summaries from the site that says we collected these samples.

MS. MOORE: Okay. Thank you.

MS. YOUNG: Okay. Are there any more clarifying questions?

MS. HEPLE: On that same site, I noticed that difference also. Could you go into a little bit more detail about the way in which a determination has been made that the contamination may actually be coming from the sites that overlap PRL-035. You mentioned, I think, S34 and L06.

MR. WALSER: Yes, I can. One of the things you have to do in this business is you have to honor the data. If you take a sample and you find that it's got volatile organic compounds in it, you have to believe that. So we've got organic contamination at a site where the history of the site doesn't indicate that

that would be likely. If this was really a place where they had buried scrap metal in the 1940s, there is nothing about that history that would cause you to believe that this other kind of contamination would be present, yet it is. So you look at the other activities that happened in that vicinity to determine whether or not one of them might be responsible for that contamination. And in this case, PRL6, is a portion of our industrial wasteland. And that's a very likely source of contamination of many different kinds. PRL S034, I would frankly have to go back to the file to remind myself what occurred at that site. But it is certainly more likely that it can fit this type of contamination that came from PRL L-6, the industrial waistline, than from PRL-035. And I apologize, my memory is just failing me. It's in the folder back there that we with can look at it, what happened at PRL S034. But that's the logic we would use, to just go and look at the fact that the history is not consistent. The samples show what they show. And a more likely source of contamination is one of these other two sites where those kind of chemicals were used were ithe case where the industrial waistline might have been carried through that area.

MR. DEPIES: Just one other measure that I would

like use to make the determination -- I too don't have the information at the top of my head. But one other measure that might have helped us in the determination was the distribution of the OCs and samples that might led us to believe that they came from another source.

MR. WALSER: That's correct. And in this case there is a definite trend of higher concentrations leading away from this site. I won't try to tell you the direction from memory. That's, again, something we have in the file. Anything else on that?

MS. YOUNG: Are there any other clarifying questions? Okay. We'll go into the official comment period now. At this point there will be no dialog. You will come to the mike. Please state your name and spell your last name and then make your comment. Let me remind you that your comments will be answered in the Responsiveness to Summary, which is located in the Record of Decision, which is at the Information Repository where you can see that at McClellan. I am looking for my flyer to hold up again. But there are maps in the back that show you how to get there. Now we are in the official comment. If you have one, please come to the mike and say your last name and spell it.

(NO RESPONSE)

MS. YOUNG: Okay. I would like to thank you all for attending. Let me remind you, if you would like to look at the site folder, we do have them in the back on the table. Thank you.

(Whereupon, the proceedings were concluded at 6:36 p.m.)

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

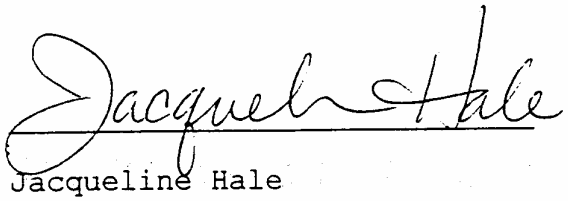
I, JACQUELINE HALE, a Certified Shorthand Reporter, licensed by the State of California and empowered to administer oaths and affirmations pursuant to Section 2093 (b) of the Code of Civil Procedure, do hereby certify:

That the said proceedings were recorded stenographically by me and were thereafter transcribed under my direction via computer-assisted transcription;

That the foregoing transcript is a true record of the proceedings which then and there took place;

That I am a disinterested person to said action.

IN WITNESS WHEREOF, I have subscribed my name on OCTOBER 21, 2002.



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